



United States Steel Corporation
Gary Works
One North Broadway
Gary, IN 46402-3199

September 15, 2017

EES Case Management Unit
Environmental and Natural Resources Division
U. S. Department of Justice
Box 7611
Washington, DC 20044-7611

Eric Cohen
Office of Regional Counsel, C-14J
US EPA, Region V
77 West Jackson Blvd.
Chicago, IL 60604

Compliance Tracker (AE-17J)
Air Enforcement and Compliance Assurance
U. S. Environmental Protection Agency
Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Phil Perry
Indiana Department of Environmental Management
Chief, Air Compliance Branch
100 North Senate Avenue
MC-61-53, IGCN 1003
Indianapolis, IN 46204-2251

Sir/Madam:

Re: *United States, et al. v United States Steel Corporation*
Consent Decree 2:12-cv-304, DJ# 90-5-2-1-06476/1
United States Steel Corporation – Gary Works – Semi-annual Progress Report

Pursuant to Paragraph X.60 of the above-referenced Consent Decree, effective March 30, 2017, U. S. Steel is submitting this semi-annual report. Please refer to the following attachment:

Attachment 1 – Gary Works Semi-annual Report

I certify under penalty of law that this document and all attached were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. This certification requirement does not apply to emergency or similar notification where compliance would be impractical.

Sincerely,

Mark Tabler
Executive Staff Vice President
Global Quality and Manufacturing Processes
United States Steel Corporation

Joseph E. Hanning
Director, Environmental Control
United States Steel Corporation
Gary Works

cc: David Hacker (USS)

Attachments

Attachment 1 – Gary Works Semi-annual Report

X.60.a. Identification of work performed and progress made toward implementing the Requirements of Section V (Compliance Requirements), Section VII (Supplemental Environmental Projects), and Section VIII (Environmentally Beneficial Project), including a narrative description of activities undertaken, the status of any construction or compliance measures, and the completion of any milestones;

1. Section V (Compliance Requirements)

1.1 Enclose openings at Blast Furnace No. 6 at Gary Works Facility

U. S. Steel Gary Works completed the enclosure on the openings of No. 6 Blast Furnace on or about November 22nd, 2016 and submitted written notification to the USEPA and IDEM on April 20, 2017.

1.2 Electronic Tracking and Management System

U. S. Steel Gary Works continues to utilize the Environmental Title V Recordkeeping System to prompt and to record the inspections required by applicable laws, regulations, and permits.

2. Section VII (Supplemental Environmental Projects)

2.1 Replacement of Lighting Ballasts and Light Bulbs in Public Schools in Gary, Indiana

On August 1st, 2017, U. S. Steel Environmental Control Director Joseph Hanning and Air Compliance Manager Marrissa Taylor (U. S. Steel) met with City of Gary Public School District Attorney Tracy Coleman, Superintendent Dr. Cheryl Pruitt, and Engineer Roger Malone (Gary Schools) to kick off the re-lamping project. During the kickoff meeting, Gary Schools identified Westside High School as the school given priority for re-lamping. If the re-lamping at Westside High School costs less than the allotted \$500,000, then additional schools will be chosen until all funds have been used. Since the meeting, Gary Schools has provided a limited project scope, including a map of the school and identification of the areas needing work. U. S. Steel has procured contractor Wesco Distribution to visit the school and develop a detailed scope of work, including all materials needed to complete the project. After a detailed scope is developed, U. S. Steel will request competitive bids for the project.

2.2 Waste Tire Removal and Disposal Project in Gary, Indiana

On June 30th, 2017, U. S. Steel Environmental Control Director Joseph Hanning and Air Compliance Manager Marrissa Taylor (U. S. Steel), Director of the City of Gary Department of Environmental Affairs Brenda Scott Henry (City of Gary) and IDEM Northwest Regional Waste Inspector Cheryl Wiseman (IDEM) conducted a conference call to kick off the waste tire disposal project. The City of Gary requested that waste tires be collected one district at a time in conjunction with the concurrent illegal dumping and community cleanup campaign and that a central collection center be established for Gary residents to bring waste tires. After a competitive bid, U. S. Steel, City of

Gary, and IDEM agreed to hire Republic Services to transport and dispose of the waste tires. The unanimous choice was based on cost of services and reputation of the bidding contractors.

The first waste tire collection boxes were placed during the week of August 14th, 2017, when the City of Gary was working through District 4 in the Illegal Dumping Campaign and 5x5x5 Cleanup. The City of Gary contacts U. S. Steel and Heritage when roll-off boxes are full and in need of pickup. This will continue until \$70,000 has been spent on the project or the 5x5x5 Community Cleanup project is complete. If the 5x5x5 Community Cleanup project is complete before the \$70,000 has been spent, then the City of Gary will identify illegal waste tire dump sites outside the 5x5x5 Districts to be cleaned. Additional information regarding the Waste Tire Removal and Disposal Project will be provided in the SEP Completion Report as provided in Appendix B, Paragraph (I)(C)(5) of the Consent Decree, once the project is complete and the funds are exhausted. 3.

Section VIII (Environmentally Beneficial Project)

3.1 Remove and Replace PCB-Containing Transformers at the Gary Works Facility

U. S. Steel identified all five (5) PCB-containing transformers at the Gary Works facility. Two (2) have already been removed and disposed. Bids for each of the remaining three (3) transformers have been received for contractors to build and deliver non-PCB replacement transformers. Orders will be placed after bids have been reviewed and approved.

3.2 Transformers S/N 5J37169 and S/N 5J37159 were removed from the west end of the Gary Works No. 4 Warehouse on March 30th, 2017 and have not been replaced. The transformers contained 41 gallons and 21 gallons, respectively, of oil 500,000 ppm PCBs. The fluid and transformers were transported by Clean Harbors. Transformers were disposed of in Coffeyville, KS. The following records are attached:

- Manifest #010273956FLE;
- Calculated weight of PCBs disposed;
- Clean Harbors Invoice #1001802066;
- Certificate of Disposal for transformers; and
- Evidence of payment of \$3,861.38.

The certificate of disposal for the PCB fluid will be provided when it is received.

X.60.b. Any significant problems encountered or anticipated in complying with the requirements of Section V (Compliance Requirements), Section VII (Supplemental Environmental Projects), and Section VIII (Environmentally Beneficial Projects), including implemented or proposed solutions;

1. U. S. Steel Gary Works has not encountered, nor does it anticipate, any significant problems in complying with the requirements of Sections V, VII, and VIII.

X.60.c. Identification and description of all non-compliance with any of the requirements of the requirements under Section V (Compliance Requirements), including description of the likely cause and of the remedial steps taken, or to be taken, to prevent or minimize such noncompliance;

1. U. S. Steel Gary Works has remained in compliance with the requirements of Section V since March 31st, 2017.

X.60.d. Identification and description of any non-compliance with any of the requirements under Section VII (Supplemental Environmental Projects) and Section VIII (Environmentally Beneficial Project).

1. U. S. Steel Gary Works has remained in compliance with the requirements of Sections VII and VIII since March 31st, 2017.



Clean Harbors
1672 East Highland Road
Twinsburg, OH
330-425-3825
Fax 330-487-5784
www.cleanharbors.com

April 5, 2017

Mr. John Leopold
US Steel
1 North Broadway Ms-70A
Gary, IN 46402

Mr. Leopold,

Enclosed you will find signed copies of your shipping documents, which indicates acceptance of your waste at our Clean Harbors PPM facility in Twinsburg, OH.

010273956FLE

RECEIVED 04/04/2017

In accordance with 40 CFR 264.12(b), Clean Harbors PPM, LLC-Twinsburg Facility has the appropriate state and federal permits to accept, store, and/or treat the waste you shipped to our facility. This letter should be kept on file with your copy of the signed manifest.

We appreciate your business. If you have any questions, please contact me at (330) 425-3825.

Sincerely,

A handwritten signature in black ink that reads "Shantanu S. Pahi". The signature is written in a cursive, flowing style.

Shantanu S. Pahi

Facility General Manager

Enclosures

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID No. IN 0006444062	2. Page 1 of 1	3. Emergency Response Phone (800) 484-3710	4. Manifest Tracking Number 010273956 FLE
5. Generator's Name and Mailing Address 1 North Broadway Ste F04 Gary IN 46402 (719) 888-4451 ATTN: John Leonoid			Generator's Site Address (if different than mailing address) 1 North Broadway Gary IN 46402		
6. Transporter 1 Company Name Clean Harbors Environmental Services, Inc.			U.S. EPA ID Number MA103932250		
7. Transporter 2 Company Name			U.S. EPA ID Number		
8. Designated Facility Name and Site Address Clean Harbors PPA, LLC 1672 East Highland Road Tombstown OH 44087 Facility's Phone: (330) 425-3325			U.S. EPA ID Number 040986975399		
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.
	1. UN2015, POLYCHLORINATED BIPHENYLS LIQUID, (MINERAL OIL DIELECTRIC FLUID), 9, PG III	002	CM	0864	K
	2. UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II	002	DM	0090	K
	3.				
	4.				
13. Waste Codes NONE					
14. Special Handling Instructions and Additional Information 1. SPECIALIZED TRANS. 855#171 2. PPE H500 ALBRIS FILE # 3205					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Officer's Printed/Typed Name Timothy Sullivan			Signature Timothy Sullivan		Month Day Year 03 30 17
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:					
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name HAROLD W POTTS, JR Signature Harold W Potts Jr Month Day Year 03 30 17 Transporter 2 Printed/Typed Name Signature Month Day Year					
18. Discrepancy 18a. Discrepancy Indication: Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection 1. F40K Manifest Reference Number: U.S. EPA ID Number 18b. Alternate Facility (or Generator) U.S. EPA ID Number Facility's Phone: 18c. Signature of Alternate Facility (or Generator) Month Day Year					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. H141 2. H141 3. 4.					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name Gail M. Gardner Signature Gail M. Gardner Month Day Year 4 4 17					

****Each Unit Must Be Marked On Sheet With All Corresponding Information Filled In****

***THIS PAGE MUST MATCH THE MANIFEST IT ACCOMPANIES**AND MUST ACCOMPANY ALL MANIFESTS

GENERATOR U.S. STEEL - GARY WORKS

[illegible]

UNIT TYPES:	Phase	MATERIAL TYPE:	TRANSFORMER TYPE:
DM=DRUM METAL	Single Phase	SWITCH	POLE
DF=DRUM FIBER	Three Phase	BUSHING	PAD
CM=CONTAINER METAL		CAPACITOR	SUBSTATION
CW=CONTAINER WOOD		DEBRIS	

Calculation of Weight of PCBs Disposed

The following calculations are based on the design capacity of each transformer. It is assumed that the PCB concentration of the oil is 500,000ppm, and the entire capacity of PCB oil was disposed.

S/N 5J37159

21 gal PCB dielectric fluid * 12.5 lb/gal PCB dielectric fluid= 262.5 lb PCB dielectric fluid

262.5 lb PCB dielectric fluid * 500,000 ppm PCB (50%) = **131.25 lb PCB**

S/N 5J37169

41 gal PCB dielectric fluid * 12.5 lb/gal PCB dielectric fluid= 512.5 lb PCB dielectric fluid

512.5 lb PCB oil * 500,000 ppm PCB (50%) = **256.25 lb PCB**



INVOICE
Invoice No 1001802066



REMIT TO:

Clean Harbors Env. Services
PO Box 3442
Boston, MA 02241-3442

EIN: 04-2698999

SOLD TO:

Accounts Payable
US Steel Gary Works
PO Box 267
Accounts Payable Dept
Pittsburgh, PA 15230 - 0000

OFFICE:

Clean Harbors PPM, LLC
1672 East Highland Road
Twinsburg, OH 44087
(330) 425-3825

*If you have any questions regarding this invoice, please
contact your customer service representative at the
telephone number listed above*

JOB SITE/GENERATOR:

US Steel Gary Works
1 North Broadway
Gary, IN 46402 - 0000

Job Description: PCB transformer removal

**** Payable in USD funds ****

Last Service Date	Invoice No	Customer	Branch	Sales Order	Purchase Order	Terms
30 Mar 2017	1001802066	USS1064	FT	1603573919	20002371-34	End Of Accounting Period Net 60

Last Service Date	Task	Task Type	Description	Total
30 Mar 2017	1603573919-001	GENERAL	1000676136 - CARCASS > 10,000 PPM (MIN CHARGE/XFMR \$200)	\$2,297.88
30 Mar 2017	1603573919-003	GENERAL	1000420804 - TRANSPORTATION COST PER TRIP FROM MIDWEST	\$1,563.50

SUBTOTAL \$3,861.38

TAX \$0.00

PLEASE PAY THIS AMOUNT ➡ INVOICE TOTAL \$3,861.38

REMIT PAYMENT BY ➡ DUE DATE 12 May 2017

Interest will be charged at a rate of 1.5% per month for all past due amounts.

Invoice Date: 12 Apr 2017

PLEASE RETURN A COPY OF INVOICE WITH PAYMENT - THANK YOU

Page 1 of 2



INVOICE
Invoice No 1001802066



TASK 1603573919-001 - 1000676136 - CARCASS > 10,000 PPM (MIN CHARGE/XFMR \$200)

Manifest Info	Item ID	Description	Manifest Qty	Manifest UOM	Billing Qty	Billing UOM	Unit Price	Amount
30 Mar 2017								
010273956FLE 1	DISPSL / CHTRH	Less than 2 PPM, Full, Pole Mount, Single phase, 25 KVA, Unk PPMCHTRH	2	EA	1,755.000	LBS	0.5000	\$877.50
010273956FLE 2	DISPSL / CHSI	PCB SOLIDS/SLUDGES FOR INCINERATION PPMCHSI	2	55DM	2.000	55DM	710.0000	\$1,420.00
	FEE-DOWN	Texas Non-Hazardous Waste Fee for Incineration			0.095	T	4.0000	\$0.38
SUBTOTAL								\$2,297.88
TAX								\$0.00
TASK TOTAL								\$2,297.88

TASK 1603573919-003 - 1000420804 - TRANSPORTATION COST PER TRIP FROM MIDWEST

Item ID	Description	Fixed Price Amount	Percent Complete	Billable Amount
30 Mar 2017				
FIXD	1000420804 - TRANSPORTATION COST PER TRIP FROM MIDWEST	1,563.5000	100%	\$1,563.50
SUBTOTAL				\$1,563.50
TAX				\$0.00
TASK TOTAL				\$1,563.50

←

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ORACLE® iProcurement

Shopping CartHomeLogoutPreferences

ShopRequisitionsReceiving

RequisitionsNotificationsApprovals

Requisitions: Requisitions > Requisitions Search > Requisition 204846194 > Blanket Release: 20002371-34, 1 (Total USD 3,861.38) > View Invoices > Invoice Details >


Payment: 420240164 (Total USD 3,861.38)

Payment Date31.Aug.2017
MethodACH
StatusReconciled
Status Date31.Aug.2017

SupplierCLEAN HARBORS ENVIRONMENTAL
Supplier SiteUS_MA_BOS
PO BOX 3442
BOSTON MA 02241-3442
Bank AccountUSS ACH Disbursing Account x1289

Export

Included Invoices

Invoice	Invoice Date	Type	Currency	Amount	Status	Payment Status	Payment PO Number	Receipt	Attachment
1001802066	12.Apr.2017	Standard	USD	3,861.38	Approved	Paid	3,861.38 20002371-34		

[Return to Invoice Details](#)

Export

ShopRequisitionsReceivingShopping CartHomeLogoutPreferences

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